

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

VALERIE LOPEZ,	§	
<i>Plaintiff,</i>	§	
v.	§	CIVIL ACTION NO. <u>4:24-cv-2252</u>
	§	
HOUSTON INDEPENDENT	§	
SCHOOL DISTRICT and RUBEN	§	
VARGAS TREJO,	§	
<i>Defendants</i>	§	

**PLAINTIFF’S NOTICE OF ORAL AND VIDEO DEPOSITION OF DEFENDANT**  
**RUBEN VARGAS TREJO**

To: RUBEN VARGAS TREJO, by and through his attorney of record, Ennio J. Diaz, 3300 S. Gessner Rd. Suite 209, Houston, Texas 77063.

To: HOUSTON INDEPENDENT SCHOOL DISTRICT (“HISD”), by and through their attorneys of record, Paul A. Lamp and Melissa M. Goins, 3700 Buffalo Speedway, Suite 500, Houston, Texas 77098.

Please take notice that, under Federal Rule of Civil Procedure, Plaintiff, VALERIE LOPEZ, will take the oral and video deposition of RUBEN VARGAS TREJO on Tuesday June 10, 2025 at 10:00 a.m. at the TDCJ L.V. Hightower Unit at 902 FM686, Dayton, TX 77535.

The deposition will be recorded stenographically and on videotape. The stenographic recording will be taken by the company Steno. Steno’s contact information is 315 W. 9th St Suite 807. Los Angeles, CA 90015; 888-707-8366; and [concierge@steno.com](mailto:concierge@steno.com).

[SIGNATURE BLOCK ON NEXT PAGE]

Respectfully submitted,

GARY E. PATTERSON

By: /s/ Gary E. Patterson

Bar No. 15590830

Federal ID: 8853

[gpatterson@gpattersonlaw.com](mailto:gpatterson@gpattersonlaw.com)

1420 Alabama Street

Houston, Texas 77004

Tel. (713) 223-3095

Fax. (713) 510-1584

***Attorney for Plaintiff***

**CERTIFICATE OF SERVICE**

I certify that on May 6, 2025, a copy of *Plaintiff's Notice of Oral and Video Deposition of Defendant Ruben Vargas Trejo* was served by email to all the counsel of record listed below:

Ennio J. Diaz

[ejd@ejdiazlaw.com](mailto:ejd@ejdiazlaw.com)

State Bar No. 24028299

Fed. I.D. No. 34829

3300 S. Gessner Road, Suite 209

Houston, Texas 77063

Telephone: (713) 497-5928

Facsimile: (713) 493-7211

***Attorney for Defendant Ruben Vargas Trejo***

Paul A. Lamp

[plamp@snll-law.com](mailto:plamp@snll-law.com)

State Bar No. 24002443

Fed I.D. No. 21711

Melissa M. Goins

[mgoins@snll-law.com](mailto:mgoins@snll-law.com)

State Bar No. 24074671

Fed I.D. No. 2089537

3700 Buffalo Speedway, Suite 500

Houston, Texas 77098

Telephone: (713) 993-7066

Facsimile: (888) 726-8374

***Attorneys for Defendant HISD***

/s/ Gary E. Patterson

Gary E. Patterson